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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION—LOS ANGELES**

YITZCHOK FRANKEL,) Case No. 2:24-cv-04702-MCS-
JOSHUA GHAYOUM,)
EDEN SHEMUELIAN, and)
DR. KAMRAN SHAMSA)

Plaintiffs,)

vs.)

REGENTS OF THE UNIVERSITY OF) **DECLARATION OF ROE 3 IN**
CALIFORNIA; MICHAEL V. DRAKE,) **SUPPORT OF MOTION FOR**
President of the University of California;) **LEAVE TO INTERVENE**

GENE D. BLOCK, Chancellor, University)
of California, Los Angeles; DARNELL)
HUNT, Executive Vice-President and)
Provost; MICHAEL BECK,)
Administrative Vice Chancellor;)
MONROE GORDEN, JR., Vice)
Chancellor; and RICK BRAZIEL,)
Assistant Vice Chancellor, each in both)
his official and personal capacities,)

Judge: Hon. Mark C. Scarsi

Defendants.)

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2 I, ROE 3, declare as follows:

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4 1. This declaration is submitted in support of Proposed Intervenor's Motion
5 for Leave to Intervene.

6 2. I am over the age of 18 and am capable of making this declaration
7 pursuant to 28 U.S.C. § 1746. I have personal knowledge of all of the contents of this
8 declaration.

9 3. I have been a professor at UCLA since 2014.

10 4. I grew up in a secular family with a Jewish father and a Christian
11 mother. I grew up in a Jewish community and participated in Passover ceremonies
12 with friends. I am anti-Zionist.

13 5. I teach courses on international studies and global development studies.
14 My classes always include significant content on racism of all forms, sections on
15 antisemitism, anti-Arab, anti-Palestinian, and anti-Muslim racism. I often teach
16 specifically about Palestine and the Nakba.

17 6. I was present in the Palestine Solidarity Encampment every day between
18 April 25-May 1. I helped with the safety team including the day after the mob attack
19 on May 1, 2024.

20 7. Students were not blocked from accessing campus buildings during the
21 entire time of the encampment.

22 8. There was no "Jew Exclusion Zone" in the Palestine Solidarity
23 Encampment. The Palestine Solidarity Encampment was created and supported in
24 collaboration with people of various faiths and included Seder and Shabbat services,
25 alongside Muslim prayer. I was present for the Seder services and led programming
26 inside the encampment.

27 9. Safety measures at the outset of the encampment were limited. People
28 regularly passed through who were not a part of the encampment. People entering the

1 encampment were asked to wear masks to prevent the spread of Covid or other
2 similar airborne illnesses, keep areas clean, and not be disruptive.

3 10. In the wake of the violent mob attack on the encampment on April 30,
4 entrance criteria to the encampment changed to prevent further violence.
5 Encampment safety teams only let people in if someone already inside the camp
6 could vouch for them, or if they had been in the camp on a previous day as evidenced
7 by colored wrist bands handed out at the entrance.

8 11. This new protocol meant that many people were turned away from the
9 encampment in its final 24 hours. This included people who arrived wearing
10 keffiyehs, a visual symbol deeply associated with Palestinian resistance, culture, and
11 activism. Entry and exit to the encampment were not based on someone's religion. I
12 turned away people the morning after the attack who did not have a wristband or find
13 someone who could vouch for them. I turned away people wearing keffiyehs who
14 embraced the encampment's calls to action.

15 I declare under penalty of perjury under the laws of the United States that the
16 foregoing is true and correct. Executed this 2nd day of May, 2025, at Los Angeles,
17 California.

18 /s/Roe 3

19 Roe 3
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